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July 17, 2025

VIA ECF

The Honorable Jennifer L. Rochon
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Cengage Learning, Inc. et al. v. Google LLC*, No. 24:cv-04274-JLR-BCM
Letter Request to File Redacted Documents

Dear Judge Rochon:

We represent Plaintiffs in this matter. Pursuant to Rule 4(B)(iii)(c) of Your Honor's Individual Rules of Practice in Civil Cases, Plaintiffs respectfully seek the Court's approval to redact certain portions of the Declaration of Attorney Jeff Kane filed in support of Plaintiffs' Response in Opposition to Google's Request to Stay Discovery.

This declaration contains a small amount of information that Defendant Google has marked "Confidential" pursuant to the Protective Order (Dkt. 82). Plaintiffs take no position on whether this information properly is designated confidential. Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs conducted a meet-and-confer with Google's counsel on July 16, 2025 to discuss this issue. Google maintained its position that this information must be filed under seal. Pursuant to Your Honor's Individual Rule 4(B)(iii)(a), Plaintiffs will notify Defendant "that it must file, within three days, a letter explaining the need to seal or redact" this information in the declaration.

Respectfully submitted,

/s/ Jeff Kane
Jeff Kane